

North Pacific Marine Radio Council

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June 4, 2004

Comments by North Pacific Marine Radio Council concerning: WT Docket No. 00-48 and RM-9499 Second FNPRM

Secretary
Federal Communications Commission
445 12th Street S.W.
TW-325
Washington, D.C. 20554

The following comments by the North Pacific Marine Radio Council (NPMRC) are in response to the Second FNPRM in wt Docket No. 00-48, released by the Commission on January 12, 2004, and refer to the specific paragraph numbers in the Second FNPRM.

A. Digital Selective Calling Equipment

79. The NPMRC takes the position that VHF radios which meet the RTCM SC101-STD or IEC 62238 should continue to be manufactured and sold for use on voluntary vessels.

The Commission in its Second Report and Order, in WT Docket No. 00-48, amended Part 80, Section.215(g)(3), which prevents the installation of non-DSC VHF radios one year after the Second Report and Order becomes effective.

There is a critical need for the installation of VHF radios which can function as a non- DSC radio. For example, in US Territorial Waters power driven vessels 20 meters or more in length that must have a separate VHF radio dedicated to meet the Bridge to Bridge Communication requirements. Most of the vessels also transit VTS areas which requires a VHF radio dedicated to VTS communications. When such vessels also engage in port operations, commercial or non-commercial communications while in a VTS area they need a third VHF radio for such communications.

VTS, Bridge to Bridge and communications such as pilot/tug communications are often very brief and can easily be missed or misunderstood due to DSC automatic channel switching and alarms. VHF radios which function as non -DSC radios are needed for these critical safety, navigation and operational communications.

We recommend the Commission provide that VHF radios manufactured to meet the minimum DSC standards for voluntary vessels have design features which can be used to disable all DSC functions for installation on vessels which have VHF radios installed in addition to the VHF-DSC radios required by existing regulations. The manufacturer should have the option to provide a means of disabling the DSC functions by the dealer, factory, qualified service technician or operator controls.

D. Commercial Operator License Issues

83. NPMRC concurs with amendment of section 13.15(b) of the Commissions rules proposed by Mr. Richard H. Weil.

F. Updated References to International Standards

86. NPMRC opposes the narrowbanding of the frequencies listed in section 80.373(g) of the Commissions rules as it would create serious interoperability problems between existing ship and coast stations and narrowband equipment.

Future of Non-DSC-VHF Radios

The subject of prohibiting the installation of non-DSC-VHF radios in the near future was not submitted for public comment. There will be a continuing need for VHF radios which can function as non-DSC radios on vessels carrying multiple VHF radios. We recommend that the Commission consider the certification, manufacture and sale of non-DSC-VHF radios for installation on vessels carrying multiple VHF radios. It should be noted that the new port operations VHF channels 75 and 76 will be mainly used for communications which should not be interrupted by DSC channel switching or alarms.

Sincerely,

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